



BRUCE L. WOODBURY  
Commissioner

*Board of County Commissioners*

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Nevada  
Environmental Protection

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ENVIRONMENTAL PROTECTION

February 1, 2008

Mr. Rod A. Moore  
Nevada Division of Environmental Protection  
Bureau of Air Pollution Control  
901 South Stewart Street, Suite 4001  
Carson City, NV 89701-5249

Dear Mr. Moore:

I am writing to provide input to the Public Hearing on the operating permit for the proposed Toquop coal fired power plant, scheduled for February 7 in Mesquite.

I am very concerned about the proposal for the following reasons:

- The air impacts from the plant, in the form of particulate matter and haze will negatively impact the citizens downwind from the facility, which at times will include those in Mesquite. People look to recreate or re-locate to Mesquite based on the high quality of life that can be found there. Pollution from a coal-fire plant, just twelve miles away will have deleterious impacts. While you have found that no federal standards will be violated, none-the-less significant quantities of potentially hazardous materials will be added to the airshed, not least of which are mercury and other heavy metals which can bio-accumulated and pose long term concerns.
- The water demands from this facility, while lower than originally proposed, are still significant. Over 13,000 acres of BLM lands were sold in 2004 under the Nevada Lands Act for private development, and the demands of this facility for limited water resources in a shared groundwater basin are troublesome. The impacts from permitting an additional 400 acre feet of water needs serious consideration. I am concerned that there is insufficient groundwater pumping data to support any conclusion that there will be no adverse affects from pumping in the Tule Desert on existing permits held by the Virgin Valley Water District.

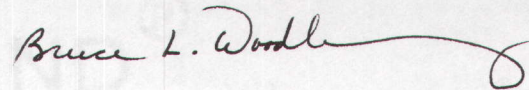


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- The plant site and associated infrastructure such as the rail line pose potential impacts and threats to plant and animal species of concern in the area. The area is important habitat for desert tortoise, and impacts on the ability of the species to recover affect all activities within its range. Perhaps of greater consequence is the recent discovery of Las Vegas buckwheat (*Eriogonum corymbosum* var. *nilesii*) adjacent to Toquop Wash in Lincoln County. At least one occurrence of this plant is less than 1 km from the proposed plant. On December 6, 2007, the U.S. Fish and Wildlife Service published notice in the Federal Register that they found the threats to this buckwheat significant enough to list it as a Candidate species under the Endangered Species Act. In addition to the direct threat posed from the physical disturbance of the site, there is the concern about nitrogen deposition to the soil from smoke stack emissions. Brooks and Pyke reported in a 2001 paper on invasive plants and fire in desert environments, that invasive and non-native grasses increase in density with increased soil nitrogen. This has the subsequent effect of potentially increasing the wildfire frequency and intensity, thus threatening the continued existence of the buckwheat at this site.
- Significant quantities of carbon will be released into the atmosphere from this plant. As a minimum, this plant should not move forward until a workable plan is put in place to sequester the majority of the carbon emissions from it.

I hope you will give serious thought and consideration to these concerns. They are echoed by many in Clark County who are concerned about this ill-advised project.

Sincerely,



BRUCE L. WOODBURY  
Clark County Commissioner

BLW/rdm/cml



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